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10 Attorneys for CITY OF EUREKA

11 Creditor and Real Party in Interest

12 UNITED STATES BANKRUPTCY COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SANTA ROSA DIVISION

15
16 In re:

17 FLOYD E. SQUIRES III AND
18 BETTY J. SQUIRES,

19 Debtors.

CASE No. 17-10828 WJL 11

Chapter 11

**INITIAL WITNESS LIST FOR CITY OF
EUREKA**

Date: March 26, 2018

Time: 9:00 a.m.

Judge: Hon. William Lafferty

Location: U.S. Courthouse
3140 Boeing Avenue
McKinleyville, CA

23 The City of Eureka ("City") submits the following list of witnesses through whom it current-
24 ly intends to submit direct evidence. The situation at the Debtors' properties is continually evolving
25 and deteriorating. In addition, the City has not yet had the opportunity to depose the Debtors or the
26 Receiver, Jeff Smith. Accordingly, the City reserves the right to call additional witnesses should:
27 (1) further relevant events occur at the Debtors' properties, or (2) it discover additional witnesses
28 during the heretofore untaken depositions. The City also reserves the right to call impeachment wit-

nesses.

The City has submitted declarations from the following witnesses in support of the Motion to Appoint Chapter 11 Trustee, with the exception of Kattie Yocum (who is incarcerated).

<u>Name</u>	<u>Description of Anticipated Testimony</u>	<u>Contact Information</u>
Bill Gillespie (Humboldt Bay Fire Chief)	Actual fires at Debtors' real properties and fire hazards at Debtors' real properties	c/o counsel for City of Eureka
Brian Gerving (Eureka Public Works)	Current and past status of Debtors' real properties	c/o counsel for City of Eureka
Brian Issa (Eureka Public Works)	Current and past status of Debtors' real properties	c/o counsel for City of Eureka
Gregory Hill (Eureka Acting Police Sergeant)	February 27, 2018 incident at 2969 California (report of shots fired)	c/o counsel for City of Eureka
Heinrich Soltow (Eureka Police Officer)	Police activity relating to Debtors' real properties	c/o counsel for City of Eureka
Kattie Yocum (Inmate)	Floyd Squires propositioning witness to exchange oral sex for lodging; testimony via videotaped deposition only	Central California Women's Facility, 203370 Road 22, Chowchilla, CA
Leonard La France (Eureka Police Sergeant)	Police activity relating to Debtors' real properties	c/o counsel for City of Eureka
Matthew Calderwood (An Electrician Vice President)	Electrical work at 833 H and Floyd Squires' demand for destruction of report stating that all electrical work needed to be replaced at the property	1 TCF Drive, Samoa, CA; mattc@anelectrician.net; 707.834.2796
Matthew Morgan (Eureka Public Works)	Current and past status of Debtors' real properties	c/o counsel for City of Eureka
Nathan Baxley (Humboldt Bay Fire Captain)	February 22, 2018 incident at 2941 California (medical emergency)	c/o counsel for City of Eureka

The City would propose that all direct testimony be via declaration only (except in the case of Yocum where it will be through excerpts from her deposition testimony) and that witnesses only

1 be called to testify live for cross-examination. Furthermore, the City would appreciate guidance
2 from the Debtors and the Court as to which witnesses will be called for cross-examination so that it
3 is not necessary to bring to the trial witnesses who will not be asked to testify live.

4 Dated: March 5, 2018.

5 FOX ROTHSCHILD LLP

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7 By /s/ Michael A. Sweet
8 Michael A. Sweet
9 Attorneys for Creditor and Real Party in Interest
10 City of Eureka
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